

PHYSICAL PROTECTION AND MATERIAL CONTROL & ACCOUNTING PROGRAM IN THE YUCCA MOUNTAIN REVIEW PLAN

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INTRODUCTION TO YMRP

NRC Regulatory Process Typically Employs Standard Review Plans (e.g., Reactors, Uranium Recovery Facilities, ISFSIs)

- > Standard Review Plans Have Several Functions
 - > Ensure review consistency
 - > Document staff review criteria
 - > Ensure all regulatory requirements are addressed
 - > Identify acceptable compliance demonstration methods
 - > Assign staff responsibilities
- > Standard Review Plans Have Consistent Content Requirements
 - > Areas of review
 - > Review methods
 - > Acceptance Criteria
 - > Evaluation finds
 - > References

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INTRODUCTION TO YMRP

Review Plan Regulatory Scope and Structure Are Based on 10 CFR Part 63

- > 10 CFR 63.21 (Content of License Application) Defines the Format and Content of the YMRP
- 63.21(b)(3) defines the Physical Protection regulatory requirements
- > 63.21(b)(4) defines the Material Control and Accounting Program regulatory requirements

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ACCEPTANCE REVIEW

Acceptance Review

- > Determines Whether Application can be Docketed
- > Does not Presuppose What the Licensing Decision Will be
- > Does not Evaluate the Technical Adequacy of Information
- ➤ Use Acceptance Review "Checklist" Based on Each Requirement of 10 CFR 63.21 (Appendix B to YMRP)
 - > Accept for review
 - > Accept, but request for additional information prepared
 - > Reject, inadequate to support detailed review

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DETAILED REVIEW

Detailed Technical Review

- If License Application Passes the Acceptance Review, it is Docketed and the Detailed Technical Review Begins
- > Determine Whether Submitted Information is Accurate and Demonstrates That Regulatory Requirements are met
- > Prepare Requests for Additional Information, if Necessary
- > Complete Preparation of Safety Evaluation Report
- > Prepare Evaluation Findings Using Examples in YMRP

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REVIEW OF GENERAL INFORMATION

- > Required by 10 CFR 63.21(b)
- > Allows DOE to Present an Overview of its Engineering Design
- > Provides a Basic Understanding of Aspects of the Site and Environs that Influence Health and Safety
- > Includes the Physical Protection Plan and MC&A Program

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REVIEW OF GENERAL INFORMATION

YMRP Section 1.3—Physical Protection Plan

- > Requires Detailed Technical Review
- Will Incorporate any Results From Ongoing Commission Reevaluation of Physical Protection Regulrements
- > GROA Description and Physical Protection Plan Implementation Schedule
- > Compliance With General Performance Objectives
 - > HLW activities will not present unreasonable risk to public health and safety
 - > Requirements of 10 CFR 73.51 will be met
 - > Adequate redundancy and diversity will be provided
 - > Maintenance will ensure effectiveness, reliability, and availability
- > The Protection Goal Will be Met
 - > Satisfy emergency dose limits of 10 CFR 72.106
 - > Update physical protection plan as needed

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REVIEW OF GENERAL INFORMATION

YMRP Section 1.3—Physical Protection Plan (continued)

- > Security Organization
- > Physical Barriers
- > Access Control Subsystems and Procedures
- > Detection, Surveillance, and Alarm Subsystems and Procedures
- > Communication Subsystems
- > Equipment Operability and Compensatory Measures
- > Contingency and Response Plans

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REVIEW OF GENERAL INFORMATION

Section 1.4—Material Control and Accounting Program

- > Requires Detailed Technical Review
- > Description of Design Basis Information
- > Assessment of Potential Impact of Material Control and Accounting Program on Design Features
- > Physical Aspects of Material Control and Accounting Program
- > Material Balance, Inventory, and Record-Keeping Procedures
- > Procedures for submitting Reports of Accidental Criticality or Loss of Special Nuclear Material
- > Procedures for Preparation of Nuclear Material Transfer Reports

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FINDINGS TO MAKE

- > A Determination of Compliance (Evaluation Finding) Must be Made for Each applicable Regulatory Requirement
- > Each YMRP Section Has Sample Statements of Evaluation Findings that Are consistent with 10 CFR Part 63 Requirements
- > Evaluation Findings Are Inserted at the End of Each Safety Evaluation Report Section
- > To Complete the Safety Evaluation Report, an Overall Determination of Compliance With Part 63 Must be Made by the Staff

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